U.S. Department of Justice

United States Attorney
Southern District of New York¶

86 Chambers Street
New York, NY 10007

May 26, 2023

BY ECF
The Honorable Paul A. Crotty
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Knight First Amendment Institute at Columbia University v. U.S. Department of State*, No. 23 Civ. 02513 (PAC)

Dear Judge Crotty:

We write jointly on behalf of Defendant the United States Department of State (the "State Department" or the "Government") and Plaintiff the Knight First Amendment Institute at Columbia University (the "Institute"), pursuant to Your Honor's May 17, 2023 Order to advise the Court that the parties have met and conferred regarding a production schedule in the above referenced Freedom of Information Act ("FOIA") matter.

The parties have agreed that the State department will prioritize Request Nos. 3 and 6 of the Institute's FOIA Request and have further agreed to the following schedule:

- By May 26, 2023, the State Department will task out Request Nos. 3 and 6 to the relevant bureaus to locate potentially responsive documents.
- By June 23, 2023, the State Department will identify (and convey to the Institute) the number of pages potentially responsive to Request Nos. 3 and 6.
- By June 23, 2023, the State Department will task out the remainder of the FOIA Request to the relevant bureaus to locate potentially responsive documents.
- By July 21, 2023, the State Department will identify (and convey to the Institute) the number of pages potentially responsive to the remainder of the FOIA Request.
- On July 21, 2023, the State Department will make its first production of responsive records, and will make additional productions on a rolling basis every 6 weeks.

The Parties are continuing their discussions regarding the appropriate rate of review and will advise the Court if they are unable to reach agreement on this point.

The Parties do not believe that a court conference is necessary at this time, and propose submitting a joint status report to the Court on July 28, 2023.

✓

5/31/2023
SO ORDERED.